

EXHIBIT 25

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 -----X
5 MARK I. SOKOLOW, et al.,
6
7 PLAINTIFFS,
8
9 -against- Case No:
10 04CV397 (GBD) (RLE)
11
12 THE PALESTINE LIBERATION ORGANIZATION, et
13 al.,
14
15 DEFENDANTS.
16 -----X

17
18 DATE: June 28, 2012
19
20 TIME: 1:40 P.M.
21
22
23
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25

26 DEPOSITION of the ELISE JANET
27 GOULD, taken by the Defendants, pursuant to
28 Notice and to the Federal Rules of Civil
29 Procedure, held at the offices of Morrison
30 & Foerster, 1290 Avenue of the Americas,
31 New York, New York 10104, before Robert X.
32 Shaw, CSR, a Notary Public of the State of
33 New York.

1 Elise Gould

2 Q. Okay. And how about high
3 school, do you remember any sessions like
4 that for her in high school?

5 A. No.

6 Q. How old was Shayna when she was
7 shot in 2002?

8 A. 19.

9 Q. So, how -- and was she enrolled
10 in any sort of schooling or education at
11 the time of the shooting?

12 A. Yes.

13 Q. Where was that?

14 (Pause.)

15 MR. SOLOMON: Take your time.

16 A. I cannot remember the name of
17 the school.

18 Q. Where was it?

19 A. Neve, Israel. N-E-V-E-Y, I
20 guess. I don't know how to spell it.

21 Q. Do you know if she received any
22 treatment or counseling while she was at
23 Neve?

24 A. Yes, I know, and the answer is
25 No, that she did not.

1 Elise Gould

2 Q. Are you aware of any evidence
3 that the PLO was responsible for the
4 shooting of your daughter?

5 A. I was told that the person that
6 shot her was a member of the organization.

7 Q. Was a member of the PLO?

8 A. I believe that is true.

9 Q. Are you aware of any other
10 evidence that the PLO had something to do
11 with your daughter's shooting?

12 A. Other than news broadcasts, I
13 guess not.

14 Q. Okay. So, apart from news
15 broadcasts and what someone told you about
16 the membership of the shooter --

17 A. I read a document that --

18 Q. Okay. Go ahead.

19 You interrupted the question.

20 You were telling me about
21 something else you were aware of?

22 A. I read a document; and that's
23 how I learned that the gentleman was part
24 of the Palestinian Organization.

25 Q. Okay. What document are you

1 Elise Gould

2 called different titles, but to me, it's
3 all one group.

4 Q. Okay. You mentioned a document
5 that someone from the Israeli Red Cross
6 gave you. Are you aware of any other
7 documentary evidence that the Palestinian
8 Authority or the PLO had something to do
9 with the shooting of your daughter?

10 A. Maybe from newspapers.

11 Q. Okay. Other than newspapers
12 and this one document you've described, are
13 you aware of any other documentary evidence
14 that the Palestinian Authority or the PLO
15 had something to do with the shooting of
16 your daughter?

17 A. Documentary? No.

18 Q. How about any other kind of
19 evidence at all?

20 A. Other than that we were told.

21 Q. Somebody told you that the
22 Palestinian Authority had something to do
23 with the shooting of your daughter?

24 A. Um-hum.

25 Q. Who was that?